

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	
v.)	CRIMINAL NO.: 22-mj-05330-JGD
)	
YAIRA RAMOS-RIVERA,)	
Respondent.)	

MOTION TO MODIFY CONDITIONS OF RELEASE

NOW COMES counsel for the Defendant, Yaira Ramos-Ramirez, and moves to temporarily modify the conditions of her release.

Ms. Ramos-Rivera is currently subject to a curfew which requires her to be in her home by 9:00 p.m. The curfew is monitored by Ms. Ramos-Rivera's third-party custodian, her sister. She requests the curfew be extended to 11:30 p.m. on Saturday, November 26, 2022, to allow her to accompany her young son (8) to an event at the TD Garden in Boston. The extension will allow her to drive back and forth from the Lowell area to Boston, and to accompany her son during the event.

Counsel for Ms. Ramos-Rivera was made aware of this request this morning. Counsel has attempted to communicate with Probation and the government to solicit their respective positions on this request. As of the time of the filing of the motion, counsel has not communicated with either Probation or the government.

WHEREFORE, Respondent requests the Court grant this request and temporarily extend Ms. Ramos-Rivera's curfew to 11:30 p.m. during the evening of Saturday, November 26, 2022.

Respectfully submitted,

YAIRA RAMOS-RIVERA,
By her attorney,

/s/Ian Gold

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November 25, 2022

CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on this date, Nov. 25, 2022.

/s/ Ian Gold